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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Administration of the North American Numbering Plan Carrier Identification Codes (CICs)	)	CC Docket No. 92-237

COMMENTS OF AT&T CORP.

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SUMMARY

In its carrier identification code ("CIC") FNPRM, the Commission seeks comment on the proper use and application of CICs, the definition of "entity" used to determine who may receive a CIC, as well as conservation issues, including the limit on CIC assignments per entity and reclamation. In general, and consistent with the Commission's objective to ensure fair and efficient overall administration of numbering resources, AT&T urges the Commission to eliminate the two carrier identification code limit at the end of the transition period on June 30, 1998, and allow each entity to obtain up to six CICs from the North American Numbering Plan Administrator ("NANPA"), as permitted under industry guidelines.

In Part I.A, AT&T first explains how it employs its three NANPA-assigned CICs, namely, for access routing and service differentiation of LDMTS, software-defined network-based services for large business customers and resellers, and FTS service to government agencies. It then shows that CICs can be used for identifying customer groups and providing service options best suited to meet their needs. AT&T also demonstrates that the CIC alternatives suggested by the Commission, such as use of an external SS7 databases, ANI look-up tables, and ANI II Digits, provide only limited substitutes for CIC functionality. Given the substantial advantages of CICs, the Commission should permit them to be used for access routing, service differentiation and customer

segmentation, so that each entity can best meet its customers' needs.

In Part I.B, AT&T urges the Commission not to adopt its proposed definition of "entity" which focuses solely on ownership interests, nor the variant recommended by the NANC. For one, complex schemes could allow one corporation to exert "control" over another without ownership, which would seemingly run counter to the Commission's intent to limit the number of CICs a single controlling entity could obtain. Moreover, and among other factors, there is no reason to believe that the proposed definition could be more easily applied than the existing one, because corporate relationships can be intricate and therefore reviewing ownership interests can be a complex task.

As also shown in Part I.B, the Commission should not adopt an exception to allow additional CICs for entities that are commonly owned under the theory that such entities are "competing with one another." Because, by definition, affiliates do not compete with one another, denying a CIC to an affiliate, when the entity already holds the maximum number of CICs allowed, would not disadvantage the affiliate nor reduce competition.

In Part II, AT&T shows that the Commission should hold that the two CIC code per entity limit will be eliminated when the transition period from three-digit to four-digit CICs ends on June 30, 1998. As the Commission found in the Second Report, this will "lessen the hardships that might

result from the conservation plan's limiting access to CICs and to services that access to CICs makes possible." In developing the current six CIC code per entity limit, the industry arrived at an appropriate balance between the need to allow access customers reasonable flexibility in the number of CICs they could obtain and the need to conserve the resource. Indeed, assuming CIC consumption proceeds just above current levels, the reserve should not be exhausted for 22 years. Thus, there is no reason to sacrifice service innovation to purely hypothetical code exhaust concerns.

AT&T shows in Section II.B that the Commission should not seek to preserve artificially the four-digit code format for as long as possible, but rather should allow the six code per entity limit to take effect, monitor consumption, and anticipate conversion to five-digit CICs as the assignment of the last four-digit codes approaches.

In Part II.C and II.D, respectively, AT&T supports the use of existing reclamation procedures by NANPA to reclaim unused codes and thus ensure that there is no need to prematurely open new CICs. In this regard, AT&T supports semi-annual reporting by LECs to monitor that assigned CICs are activated. AT&T also agrees that the NANPA should continue to monitor CIC assignments, predict exhaust potential and report its finding to the industry.

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COMMENTS OF AT&T CORP.

Pursuant to the Commission's Further Notice of Proposed Rulemaking ("FNPRM"), FCC 97-364, released October 9, 1997, and related public notices, AT&T Corp. ("AT&T") submits these comments on the application and use of Feature Group D ("FGD") Carrier Identification Codes ("CICs").[1] In the FNPRM (para. 12), the Commission seeks comment on the proper use and application of CICs, the definition of "entity" used to determine who may receive a CIC, as well as conservation issues, including the limit on CIC assignments per entity, and reclamation.

[1] Subsequent to the release of the FNPRM, the Commission extended the comment filing schedule to permit the North American Numbering Council ("NANC") to provide the Commission with its report and recommendations concerning CIC codes. See Order, DA 97-2439, released November 21, 1997. On March 3, 1998, the FCC released the Report and Recommendations of the CIC Ad Hoc Working Group to the NANC Regarding Use and Assignment of Carrier Identification Codes, DA 98-412 ("NANC Recommendations").

In general, and consistent with the Commission's objective to ensure fair and efficient overall administration of numbering resources, AT&T urges the Commission to eliminate the two carrier identification code limit at the end of the transition period on June 30, 1998 and allow each entity to obtain up to six CICs from the North American Numbering Plan Administrator ("NANPA"), as permitted under industry guidelines.

AT&T fully participated in the development of the NANC's recommendations and, with one exception, endorses those recommendations. AT&T believes, however, that the NANC's proposal as to how the term "entity" should be defined for CIC code assignment purposes could allow for gamesmanship (infra, p. 10).

I. THE COMMISSION SHOULD ALLOW EACH ENTITY TO USE ITS AUTHORIZED CICS WITHIN BROADLY DEFINED PARAMETERS.

Within the broad parameters discussed in Part A below, the FCC should afford each entity the flexibility to decide how to use its CICs to its own advantage for the benefit of its customers. In Part B, AT&T addresses the Commission's proposed definition of "entity" and urges that it not be adopted given its numerous practical shortcomings.

A. Use and Application of CICs

The Commission requests comments on the current and potential uses for CICs and possible alternatives to CICs (FNPRM, paras. 17-18). FGD CICs are used by access providers (*i.e.*, local exchange companies) for access routing and billing purposes. CICs also permit access

customers (*i.e.*, interLATA and intraLATA toll providers) to support distinct service offerings on their networks and potentially offer subscribers customized products which best meet their needs.

AT&T currently uses its three NANPA-assigned CICs for access routing and for service differentiation. AT&T's primary code is assigned to AT&T residential subscribers and most business subscribers, and is used to route traffic to AT&T's switched network for completion via AT&T's family of Long Distance Message Telecommunications Services ("LDMTS").

AT&T employs a second code to identify traffic to customers through use of software defined network features. These services are typically used by large business customers and by resellers. The unique CIC associated with these services permits the efficient provision of features specific to such services and the implementation of the necessary call processing required to support such features.

A third AT&T CIC is used to identify and route traffic destined for the AT&T-provided portion of the Federal Telecommunications System ("FTS"), a separate facility network provided by AT&T to serve the telecommunications needs of government agencies. A separate CIC is required to route FTS traffic over access trunks that link the LEC end offices to the FTS switches.

AT&T is aware of several other existing and potential uses of CICs. CICs could be used for identifying customer groups, which would be offered features and

functions unavailable to other groups of subscribers, thereby providing service offerings which ideally meet the needs of specific customer segments. CICs can also be used for marketing purposes to highlight and differentiate a particular offering. MCI's "10321" service is an example of a product directly linked to the use of a unique CIC. CICs could also be used to improve quality for specific call types, for example, by identifying the call through the use of a separate CIC and providing that call with special routing and transmission (*e.g.*, data versus voice calls). These uses afford carriers the ability to offer customers increased choice, one of the key consumer benefits of a competitive marketplace.

The Commission asks commenters to consider possible alternatives to CICs and requests comments on the application of these alternatives (FNPRM, para. 18). First, the Commission cites the use of a database external to the originating switch and the use of SS7 signaling to obtain information from that database. However, the example provided (FNPRM, fn. 32) of using an SS7 database to identify the primary interexchange carrier ("PIC") would not obviate the need for CICs. Information associated with the PIC of a calling line, even if resident in an external database rather than the switch, would still require a CIC to support access routing of the call. That is, the database query would retrieve a CIC and return that CIC to the switch for access routing. Thus, although SS7 provides

significant capabilities to transmit information between offices and networks, it is not a substitute for CICs. CICs are needed to provide a means for the access provider, within the end office, to identify the end user's presubscribed carrier and use that information to select an access customer (*i.e.*, an IXC) and the appropriate routing. These decisions take place before inter-network SS7 signaling is required.

Second, the Commission suggests the use of pseudo-CICs for billing and identification of services. This is certainly appropriate. Identifiers other than CICs should be used for purposes which are internal to a given carrier's network and are not used to route calls across a network boundary. Indeed, the current CIC guidelines set aside 200 CICs for common use within carriers' networks for this very purpose, and potentially limit the demand for CICs to accommodate these internal needs. One appropriate conservation measure would be not to increase this allotment.

The Commission also cites the use of ANI to support certain functionalities that might otherwise be implemented using CICs. There may, indeed, be some applications where the use of ANI tables (*i.e.*, large databases with lists of telephone numbers) could be used to implement a process, which would require a table look-up on all calls, to determine if the calling party is subscribed to a given service feature which should be provided on the

call. The same capability, however, might be provided more efficiently if there were a positive indication (*i.e.*, a unique CIC) which would indicate specific call processing was necessary.

Finally, the Commission refers to ANI Information (II) Digits and suggests that unique II pairs associated with a calling line might be used in lieu of CICs to identify a specific service. Such an application is possible, although most ANI II digits indicate the type of calling line (*e.g.*, payphone, hotel, hospital) rather than a service. Moreover, although service identification could be associated with ANI II digit pairs, the number of available ANI II pairs is limited, as are the associated class of service codes, and likely could not accommodate the potential demands of all access customers. Furthermore, this use of ANI II digits restricts the identification of unique service needs to a given calling line and does not provide the flexibility offered by CICs. For example, a subscriber may have a business line connected to a corporate network identified by unique ANI II digits. This identification method would not permit the subscriber to access the corporate network from another line which was not associated with the designated ANI II pair, whereas the use of a CIC would afford a means to do so through 10XXX/101XXXX dialing.

The industry has approved standards that support the use of CICs for the aforementioned purposes without the

need to segregate traffic by trunk group. Previously, the use of different CICs that would route to the same network required the use of separate access trunk groups to allow the access customer to distinguish calls associated with a given CIC from calls associated with other CICs, despite the fact that use of multiple trunk groups is potentially inefficient and costly. Within the last few years, the Carrier Identification Parameter ("CIP") has been defined within the SS7 call set-up protocol to forward, on a call-by-call basis, the CIC associated with a given calling line. Accordingly, an access customer can provision its access in large efficient trunk groups, receive all its access traffic, for all of its CICs, over that trunk group and distinguish the individual service types by using the CIC information which is embedded in the signaling message associated with each call. This capability is directly supportive of the efficient use of multiple CICs by a single entity. The Commission should require local exchange carriers to implement the CIPs uniformly so as to optimize FGD access.

To ensure the maximum flexibility for CIC use, the Commission should allow each entity to obtain from the NANPA its authorized number of CICs and permit the entity to use its CICs for access routing, service differentiation and customer segmentation. The Commission should ensure only that the broad categories of CIC uses are appropriate.

For example, as the Commission notes (FNPRM, paras. 19-20), the CIC Assignment Guidelines allow an entity a total of two "special use" CICs in addition to its authorized amount, if "extraordinary and infrequent technical constraints in access provider's networks . . . arise where an entity, whose intent was to offer a service without the use of a CIC, is required to use a CIC." Although this category exists, no special use CICs have ever been assigned. Thus, AT&T would support elimination of "special use CICs" as unnecessary.

B. Definition of "Entity"

Section 3.1 of the CIC Assignment Guidelines states that CICs are assigned to access customers or entities and defines an "entity" as "a firm or group of firms under common ownership or control" (FNPRM, para. 21). The Guidelines provide that the franchiser will be considered the "entity" for CIC assignments but allows franchisees to use the franchiser's CICs.

The Commission proposes to eliminate the control element from the definition of entity and instead define "entity" (for CIC assignment purposes only) based solely on ownership interest (FNPRM, paras. 22-24). Specifically, the proposed definition provides that:

> "Two or more entities shall be deemed commonly owned and a single entity if - (1) one entity directly or indirectly has an ownership interest in the other entity; or, (2) such entities are directly or indirectly owned by the same person, as defined in 47 U.S.C. § 153(32)."

Because control is not part of the proposed test, under this rule, each franchisee (which is not owned by or in common with another entity that has its maximum complement of CICs), could have its own CIC code.

AT&T favors retention of the current definition of "entity" because of several shortcomings of the proposed one. Under the proposed definition, entities would be deemed commonly owned for purposes of CIC assignment if one entity owns a single share of stock in another, certainly an undesirable result. Second, complex schemes could allow one corporation to exert "control" over another without ownership, which would seemingly run contrary to the Commission's intent to limit the number of CICs a single controlling entity could obtain from the NANPA. Third, allowing each franchisee (within the constraints noted above) to obtain its own CIC could potentially increase CIC consumption, without any evidence that the current rule has not worked effectively in the franchise context.

Finally, and equally important, there is nothing to support the Commission's observation that "eliminating the control element, and permitting the NANP administrator to determine an applicant's eligibility for a CIC assignment on the basis of ownership only, would simplify the CIC eligibility determination. . . ." At bottom, both the existing or proposed definition can be applied easily to the well known participants in the communications industry, and either test can be difficult to apply to others because

corporate relationships can be intricate and therefore reviewing ownership interests can be a complex task.

Should the Commission nonetheless adopt the "ownership" only definition, it should modify the test so that an ownership interest would not be found to exist unless one entity has more than a ten percent equity interest in another. See 47 U.S.C. § 153(33). By contrast, the Commission should not adopt the NANC's recommendation (para. 21) of an ownership test, based on 50 percent or more equity interest. This test would, in AT&T's view, allow for gamesmanship regarding the use of codes because far less than a 50 percent equity interest could enable a firm to both obtain "control" and derive "economic benefits" from the use of CIC codes. On the other hand, AT&T agrees with the NANC (para. 23) that entities, whether affiliated or not, should be permitted to share CIC codes as a matter of business arrangements between them.

Moreover, there should not be an exception to allow additional CICs for entities that are commonly owned under the theory that such entities are "competing with one another" (FNPRM, para. 30). The Commission's example, that Bell Atlantic Mobile and Bell Atlantic BOC may at some point be competing with one another, if the latter begins offering long distance, is fundamentally wrong. In reality, any customers lost to such "competition" represent left pocket-to-right pocket transactions and a means to potentially game the Commission's rules. Because affiliates

do not compete with one another, denying a CIC to an affiliate, when the entity already holds the maximum number of CICs allowed, would not disadvantage the affiliate nor reduce competition.[2] On the other hand, to the extent that using a single CIC allows information sharing, particularly among a BOC and its Section 272 and 274 affiliates, the nondiscrimination requirements applicable to those relationships must be strictly enforced.[3]

II. THE COMMISSION SHOULD CLARIFY THAT THE TWO CIC CODE PER ENTITY LIMIT WILL BE ELIMINATED WHEN THE TRANSITION PERIOD ENDS.

In the April 1997 Second Report[4] the Commission determined that the transition for conversion from

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[2] At the same time, using separate CICs could permit a carrier to hide discriminatory conduct. For example, a BOC could put its most profitable customers in a particular affiliate with its own CIC code, and then would know to give preferential service to that CIC. When the BOC's service to all of its own customers was averaged out, there would be no appearance of discrimination. Accordingly, metrics, such as those related to PIC changes, should always be measured by CICs rather than by carrier because carriers frequently employ more than one CIC. See *Ex Parte* Letter, dated June 20, 1997, from Charles E. Griffin, AT&T to William F. Caton, Acting Secretary, FCC, Non-Accounting Safeguards, CC Docket No. 96-149, pp. 5-6.

[3] See AT&T's Comments in Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, CC Docket No. 96-115, filed March 17, 1997.

[4] Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), Second Report and Order, CC Docket No. 92-237, FCC 97-125, released

(footnote continued on following page)

three-digit to four-digit CICs will end on January 1, 1998,[5] because eliminating disparate dialing arrangements serve the overall procompetitive purposes of the 1996 Act and lessen any negative effects of the disparity that may arise during the transition. It also found that ending the permissive dialing period lessens the hardships that might result from the current conservation plan's limiting access to CICs and to services that multiple CICs make possible (id., paras. 32-33). In the Reconsideration Order, the Commission adopted a phased approach to the end of the transition, requiring local exchange carriers to accommodate four-digit CICs by January 1, 1998, and allowed IXCs until June 30, 1998 to educate their customers after local switches are upgraded to recognize the longer codes.

A. Limit on CIC Assignments Per Entity

Although the Commission declined to do so in the Reconsideration Order (para. 36), it should now hold

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(footnote continued from previous page)

April 11, 1997, paras. 27, 32 ("Second Report"), modified on recon., Order on Reconsideration, Order on Application for Review and Second Further Notice of Proposed Rulemaking, FCC 97-386, released October 22, 1997 ("Reconsideration Order").

[5] The three-digit CIC is part of a five-digit carrier access code (10XXX), whereas the four-digit CIC is part of a seven-digit carrier access code ("CAC") (101XXXX). During the transition period, both three-digit and four-digit CICs could be utilized. Once the transition period is over, all customers would be required to use the four-digit CIC (thus, AT&T's carrier access code would then become 1010288).

expressly that when the transition period ends, the two CIC code per carrier limit specified in the modified conservation plan (Second Report, para. 31) will terminate and carriers will be free to obtain additional CICs to satisfy their need for additional codes, in accordance with industry guidelines that limit each entity to six Feature Group D CICs.[6] Notably, one of the Commission's stated objectives in ending the transition was "to lessen any hardships that might result from the conservation plan's limiting access to CICs and to services that access to multiple CICs makes possible."[7] And, the Commission's sole basis for not ending the conservation and transition periods simultaneously is that the "maximum number of CICs assigned to an entity is one of the many issues raised" in this FNPRM. Id.

To be sure, the numerous possible uses and applications for CICs cited above (in Part I.A) could

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[6] INC 95-0127-006, Section 3.1.

[7] Second Report, para. 33. For example, the Second Report (para. 27) states that a "shorter transition period will allow us to end sooner the conservation plan which, as modified below, limits to two the number of CIC assignments per eligible applicant. . . ." Likewise, as the Commission also noted (id., para. 30), "the conservation plan, as modified, is necessary *as long as* the *transition continues* because abolishing the conservation plan during this period would likely cause rapid depletion of unassigned four-digit CICs in the 5XXX and 6XXX range and necessitate a flash-cut to four-digit codes" (emphasis added).

directly impact the demand for CICs. And, AT&T agrees CIC conservation will remain an important consideration once that transition ends (FNPRM, para. 34), given that CICs are a valuable numbering resource. However, the industry, in the development of the existing CIC guidelines, attempted to strike a balance between the need to allow access customers reasonable flexibility in the number of CICs they could obtain and the need to conserve the resource. The consensus resolution of a limit of six CICs per entity supports that balance. The Commission should allow that limit to take effect.

AT&T strongly disagrees with the Commission's observation that "an increase in the number of CICs an entity may be assigned, beyond the current limit of two, would adversely affect conservation efforts." Indeed, AT&T estimates that if CIC consumption proceeds at the level of 25 codes per month (just above the current level of 23), with the opening of the full 10,000 codes in July 1998, the reserve should not be exhausted for 22 years.[8] Thus, once the transition period is over, there will be no shortages of codes and carriers do, in fact, need additional CIC codes and should be able to obtain them.

As Bellcore (the entity then serving as the NANPA) has acknowledged, carriers have multiple uses for CIC codes

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[8] See Appendix A for AT&T's calculation of this figure. Accord NANC Recommendations, para. 34.

and "a failure to make assignments could adversely affect development of new services."[9] Thus, allowing the six CIC per entity limit to take effect will serve to promote competition among telecommunications service providers by enabling them to provide new and innovative services using CICs. Accordingly, the Commission should lift the two code per carrier limit at the expiration of the transition period. This will allow carriers to obtain CICs to serve new applications, without creating code exhaust problems.

Contrary to its tentative conclusion (FNPRM, para. 36), the Commission should not eliminate the distinction between CICs obtained by direct assignment from the NANPA and CICs obtained by other means. Acquisition of CICs already released by NANPA does not deplete the pool of CICs available for assignment by NANPA. Moreover, obtaining CICs through mergers and acquisitions is a normal marketplace function. In all events, the FCC can determine whether a particular acquisition is consistent with the public interest at the time of transfer of control or FCC licenses and impose conditions on the transfer, including limitation on CICs, if appropriate. Accordingly, there is no need to modify the guidelines such that the total number of CICs any entity could hold would include CICs obtained

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[9] Letter, dated October 2, 1995, from R. R. Conners, Director, NANP Administration, Bellcore to Kathleen M. H. Wallman, Chief, Common Carrier Bureau, FCC.

through acquisitions or requiring automatic reversion of CICs whenever a single entity exceeds a specified limit (FNPRM, paras. 37, 38).

B. Limit on Assignable Four-Digit CICs and Transition to Five-Digit CICs

AT&T agrees with the Commission's proposal (FNPRM, para. 42) to open up all four-digit CICs for assignment once the transition ends rather than continuing to limit the number of CICs to a discrete pool. The Commission should not seek to preserve artificially the four-digit CIC format as long as possible through stringent conservation measures, but should allow the six code per entity limit to take effect, monitor the four-digit CIC availability, and anticipate conversion to a five-digit CIC format as the assignment of the last four-digit CICs approaches (FNPRM, para. 40). Conservation measures should be implemented at whatever time the industry needs to start planning for five-digit CIC codes. This could, for example, be set a time when a specified percentage of four-digit CICs remains or when "it is determined the CIC resource will exhaust in less than the time estimated by the industry to develop and deploy an expanded five-digit CIC plan."[10] The industry recognized the future need for five-digits CICs and the ability to accommodate them in a seven-digit CAC in the format 10XXXXX.

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[10] NANC Recommendations, para. 31.

C. Reclamation

AT&T supports the use of the existing reclamation guidelines, which allow the NANPA to require mandatory return of any CICs that are not in use. The "use it or lose it" policy ensures that there is no need to prematurely open new CICs. However, the Commission should not require that a CIC be used for its original purpose if the entity holding the code has an alternative new or different use for the code that is consistent with the broad parameters for CIC applications.

D. Usage Monitoring

AT&T also agrees that the NANPA should continue to monitor CIC assignments, predict exhaust potential and report its finding to the industry (FNPRM, para. 52). AT&T also supports semi-annual reporting by local exchange carriers, to determine which CICs have been assigned but never activated (*i.e.*, access was never purchased or has been disconnected), which would provide a basis for reclamation.

CONCLUSION

For the reasons stated above, the Commission should lift the two CIC code per carrier limit upon expiration of the transition period on June 30, 1998, and allow each entity to obtain up to six CICs from the NANPA and use those codes within the broad parameters identified.

Respectfully submitted,

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APPENDIX A

AT&T'S ESTIMATE OF CIC DEMAND

AT&T estimates that the supply of 4-digit CICs will last for over 20 years. Key to any estimate of CIC usage is a prediction of the pent-up demand that would be generated when the current two code per entity conservation rule is lifted. AT&T believes that not all code holders would seek to obtain their full complement of six codes. Indeed, examination of code assignment summaries prior to the implementation of the original conservation limit for 3-digit CICs reflects this fact. Conservation of CICs and associated assignment limits were first imposed after the assignment of the 700th 3-digit code. At that time (June 1989), only about 20% of (540) code holders had requested more than a single code. In fact, only 8% had been assigned their full complement of three codes while 12% had two codes.

It is recognized that today's larger number of code holders and perhaps their better understanding of the potential uses of CICs might produce demands in excess of those recorded in the 1989 timeframe. Accordingly, for purposes of this estimate, AT&T assumed that the distribution of code assignments should reflect that 40% of code holders would require more than the minimum number of codes, and that fully 30% of code holders would request their full allotment of six FGD CICs while 10% would seek additional codes but fewer than the maximum. AT&T further assumed that those entities who wish to obtain their full complement of codes will need to request an average of four additional assignments to reach the six code limit. Additionally, AT&T assumed that those other entities who seek additional codes, but fewer than the maximum, will request an average of two CICs. Accordingly, if there currently exist about 1200 entities who are assigned at least one code, then

(1200) x 30% = 360 entities x 4 codes/entity = 1440 codes

(1200) x 10% = 120 entities x 2 codes/entity = 240 codes

or a total of 1680 codes will be requested upon the elimination of the current conservation constraints. Presently, about 1500 CICs are assigned. The above predicted pent-up demand will increase the total assignments to about 3200 leaving 6600 remaining. Assuming an assignment rate of 25 codes per month (the current rate is 23 per month), this supply of codes will last 264 months or about 22 years.